Case 2:06-cv-00925-PGS-ES Document 59 Filed 05/29/2008

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP

Counselors at Law

FOUR GATEWAY CENTER
100 MULBERRY STREET
NEWARK, NEW JERSEY 07102
Newark (973) 622-3000
New York (212) 714-1720
Fax (973) 623-7780
www.tompkinsmcguire.com

Marc C. Pakrul Associate

Tel: (973) 623-7692 E-Fax: (973) 623-7691 mpakrul@tompkinsmeguire.com

Page 1 of 2

May 29, 2008

VIA ELECTRONIC FILING

Honorable Peter G. Sheridan, U.S.D.J. c/o Clerk, United States District Court Martin Luther King Jr. Federal Building 50 Walnut Street
Newark, New Jersey 07101-0999

Re:

Kovacevec, et al. v. Wells, et als. Civil Action No: 06-CV-925 (PGS)

Our File No: 2042-1

Dear Judge Sheridan:

Please be advised that this firm represents defendants/third-party plaintiffs, SGT 2000, Inc., SGT 2000 Motor Freight, Inc. and Allan J. Wells, in connection with the above referenced matter. The Court previously issued an Order in which all dispositive motions were to be returnable no later than June 2, 2008. The Court subsequently granted an extension of the filing deadline to Third-Party Defendant, Circle Imports, who did not file a Motion for Summary Judgment in a timely manner, and adjourned the return date of Circle's Motion to June 16, 2008. We respectfully request that Your Honor adjourn the return date of Circle's Motion to July 7, 2008, as we require additional time to prepare opposition on behalf of our clients. We have encountered scheduling conflicts in the preparation of our opposition, as we had planned to complete opposition to any dispositive motions based upon our anticipation of a June 2, 2008 return date. Counsel for Circle has consented to our request.

Thank you for your Honor's attention to this matter. Should you have any questions or comments, please do not hesitate to contact me.

Respectfully submitted

Marc C. Pakrul, Esq.

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP

MCP

VIA ELECTRONIC FILING

ce.

Michael J. Maggiano, Esq.

Matthew T. Pisano, Esq.

Nicholas J. Lombardi, Esq.

Case 2:06-cv-00925-PGS-ES Document 59

Filed 05/29/2008 Page 2 of 2

TOMPKINS, McGUIRE, WACHENFELD & BARRY

Page 2

Mark Berard, Esq. David M. Welt, Esq. John G. Tinker Jr., Esq.